

## Hull University Teaching Hospitals NHS Trust

### Modern Slavery Statement 1 April 2019 to 31 March 2020

#### 1. Introduction

The Modern Slavery Act 2015 requires organisations to publish an annual Modern Slavery Statement on their website within six months of the end of the financial year (i.e. for the Trust this would require the statement to be published by 30 September). The Trust also, in normal circumstances, includes the annual Modern Slavery Statement in the Annual Report.

However, in April 2020 the Government advised that, due to the COVID-19 pandemic, organisations would not be penalised if they needed to delay the publication of Modern Slavery Statements if they were, for example, facing staffing challenges.

Therefore due to workforce pressures relating to the pandemic, the Trust has delayed the publication of the statement by two months and only included a reference (rather than the full statement) in the Trust Annual Report.

The Trust is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. Whilst this statement has been delayed, the organisation has continued to adhere to the requirements of the Act during this time.

#### 2. Background

Modern slavery continues to be prevalent across the UK, with the number of people identified as victims of modern slavery rising year on year. In March 2020, the Office for National Statistics<sup>1</sup> reported:

- The national Modern Slavery Helpline received a 68% increase in calls and submissions in the year ending December 2018, compared with the previous year.
- There were 5,144 modern slavery offences recorded by the police in England and Wales in the year ending March 2019, an increase of 51% from the previous year.
- The number of potential victims referred through the UK National Referral Mechanism (NRM) increased by 36% to 6,985 in the year ending December 2018.

It is therefore important that organisations continue to support the Government's Modern Slavery Strategy, by taking steps to ensure that modern slavery (i.e. slavery and human trafficking) is not taking place in any part of its own business or supply chains.

#### 3. Statement

This statement sets out the steps that Hull University Teaching Hospitals NHS Trust has taken over the financial year 1 April 2019 to 31 March 2020 to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains.

The statement covers the following:

- Organisational structure, business and supply chains
- Policies in relation to slavery and human trafficking
- Due diligence in our business and supply chains
- Assessing and managing risks in our business and supply chains
- Performance indicators
- Training in slavery and human trafficking

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<sup>1</sup> Office for National Statistics

<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/modernslaveryintheuk/march2020>

### **3.1 Organisational Structure, Business and Supply Chains**

#### **3.1.1 Organisational Structure and Business**

Hull University Teaching Hospital NHS Trust is a large acute NHS Trust situated in Kingston upon Hull and the East Riding of Yorkshire. The Trust employs just over 7,000 whole time equivalent staff, has an annual income of circa £639m million and has two main sites; Hull Royal Infirmary and Castle Hill Hospital. Outpatient services are also delivered from locations across the local health economy area.

The Trust's organisational structures are available on the Trust's internet site <https://www.hey.nhs.uk/downloads/structure/>.

Further details regarding the Trust's business is provided in the Annual Report and Accounts 2019/20 which is available on the Trust's internet site <https://www.hey.nhs.uk/about-us/corporate-documents/>.

#### **3.1.2 Supply Chains**

The Trust's Procurement and Supplies Department is responsible for spending £120m non-pay which includes:

- £19m through the Supply Chain (compared to £28m in the previous statement);
- £65m from goods ordered directly (not Supply Chain) through goods and service maintenance contracts (compared to £55m in the previous statement);
- £37m on other contracts, for example; car park and security, transport and all other service type contracts (which remains the same as the previous reporting period).

It must be noted that these figures are approximate and will fluctuate year on year.

The Trust does not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

### **3.2 Policies in Relation to Slavery and Human Trafficking**

Trust policies, for both service users and staff, are subject to a thorough consultation and ratification process with input from staff side and management representatives, prior to being published on the Trust's intranet site.

Trust policies in relation to the Modern Slavery Act 2015 (which include the Raising Concerns at Work (Whistleblowing) Policy, Equality, Diversity and Inclusion in Employment Policy and Bully and Harassment Policy, etc.) are available to staff via the Trust's intranet site and to the public through a Freedom of Information request. The Trust continues to be committed to reviewing policies on a regular basis and in line with changes to legislation.

#### **3.2.1 Safeguarding Policies**

The Trust continues to publish a broad range of safeguarding policies and factsheets, for both service users and staff, on the Trust intranet which are reviewed as required.

New factsheets published on the Trust intranet during the last financial year include:

- Key contacts and support in Humberside
- Exploitation, spotting the signs

### **3.3 Due Diligence Processes in the Trust's Business and Supply Chains**

#### **3.3.1 Due Diligence in Business**

The Trust is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. The Trust also has a responsibility to ensure that workers are not being exploited, that they are safe

and that relevant employment (working hours etc.), health and safety, human rights laws and international standards are adhered to.

The Trust's recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from abuse or coercion.

All active agencies who supply staff to the Trust are asked to provide assurance that they are compliant with the Modern Slavery Act 2015 on an annual basis.

### *3.3.2 Due Diligence in Supply Chains*

The Trust continues to expect that the supply chains it works with have suitable anti-slavery and human trafficking policies and processes in place.

Within the Procurement Department, all of the Trust tenderers continue to be expected to respond to the question within the Selected Questionnaire document, tender document and quotation document to provide assurance that they adhere to the Modern Slavery Act. A central database has been set up to record this assurance from tenderers.

The Facilities Department (who manage the supply of some of the Trust's key contracts e.g. cleaners etc.) has also continued to monitor which of their suppliers are compliant with the Modern Slavery Act 2015 during the last financial year.

47 suppliers within the Facilities Department were identified, and out of these:

- 37 organisations have shared their modern slavery statement with the Trust
- 6 organisations do not meet the requirement to produce an annual modern slavery statement (i.e. annual turnover is below £36m)
- 4 organisations have not yet provided their statement; however the Facilities Team will continue to try and obtain these.

Over the next year, the Facilities Department is planning to review how they continue to monitor which of their suppliers is compliant with the Modern Slavery Act 2015 in order to streamline the process.

### **3.4 Assessing and Managing Risks in our Business/Supply Chains**

Within the Trust's business the following will continue to safeguard the Trust against slavery and human trafficking:

- All staff are employed on employment contracts which comply with UK law.
- All employees including those transferred into the Trust and doctors in training; volunteers (including students and trainees on work experience); agency staff, contracted out staff and other people accessing the Trust in an official capacity, e.g. those involved in the Patient Advocacy and Liaison Service (PALS), and those subject to an honorary contract undergo pre-employment checks.
- All staff undertake mandatory safeguarding training, which covers modern slavery.
- The Trust is considering a new model to replace the Safeguarding Champion role which provides individuals with an understanding of the fundamentals for good safeguarding (which includes modern slavery and human trafficking). To improve dissemination of safeguarding updates and information, proposals for a new model are to be presented to the Safeguarding Committee meeting in November 2020.
- A comprehensive range of modern slavery and safeguarding information for service users and staff is available for staff on the Trust intranet.
- As an equal opportunities employer, the Trust is committed to creating an inclusive working environment for all staff, which enables staff to feel confident that they can

raise concerns without any risk to themselves via a number of avenues, e.g. via the Freedom to Speak up Guardian etc.

- The Trust continues to have strong links with the Humber Modern Day Slavery Partnership, with representatives from both the Safeguarding Children's Team and Safeguarding Adult's Team sitting as part of a strategic group within the partnership.
- The Trust will continue to evolve and learn and develop new processes to safeguard the organisation and the population it serves against modern slavery. Following a scoping meeting held in January 2020, in response to two cases in which the patients needed a place of safety following discharge, there is now a multi-agency agreement to hold an emergency/short notice strategy meeting with key partner representatives. In addition to the Trust's Safeguarding Adults Team, key partners include: The Local Authority Safeguarding Adults Team, Independent Domestic Violence Advocate/Hull DAP, Domestic Abuse Team and PVP Unit/Humberside Police, the Hospital Social Work Team and the Mental Health Team.
- The Trust, in collaboration with the local CCGs (Hull and East Riding), Humber Teaching Foundation Trust and City Health Care Partnership, developed and held a Safeguarding Adults Conference (Level 3) 'The Voice of the Person'. Several key topics were covered, which included modern slavery 'A Local Perspective', delivered by a representative from one of the local Safeguarding Adults Board. Following evaluation and positive feedback received, particularly around the theme of modern slavery, the Trust will plan to develop a Safeguarding Adults Conference annually.

The Trust continues to reduce the risk of modern day slavery occurring within the organisation's supply chains by ensuring the Selected Questionnaire document, tender document and quotation document are up-to-date and continue to request tenderers to provide assurance that they adhere to the Modern Slavery Act 2015.

Whilst there is more of a risk for non-compliance when goods and services are procured outside of the tendering process, there continues to be robust processes in place to mitigate these risks. All goods purchased outside the tendering process must adhere to the Trust's Standing Financial Instructions and are subject to the Purchase Order Version of the Terms and Conditions for both goods and services (January 2018) which references modern slavery. Also, purchases of £10k or more must have 3 official quotations.

The Trust will continue to review its major suppliers, with a view to obtaining their ongoing commitment to compliance with the Act.

### **3.5 Performance Indicators**

Compliance with the Trust's modern slavery agenda is measured via the following:

- All staff are required to complete mandatory safeguarding training (which includes modern slavery). As of March 2020, in excess of 90% of Trust staff are compliant with the required training, which is consistent with previous years.
- Relevant departments (e.g. Procurement, Facilities etc.) ask suppliers to provide assurance that they are compliant with the Modern Slavery Act 2015.
- All staff undergo the relevant pre-employment checks.
- Any modern slavery concerns are raised through the Trust's incident reporting system (DATIX) and referred to the Safeguarding Team for investigation.

### **3.6 Training in Modern Slavery and Human Trafficking**

The Trust provides training to staff on modern slavery via the following courses/eLearning packages:

- Safeguarding Adults (mandatory for all staff)
- Modern Slavery and Human Trafficking
- Introduction to Migration

Modern Slavery is also embedded into other relevant training programmes including Recruitment and Selection.

Throughout 2020 all midwives within the Trust are required to undertake additional training around modern day slavery as part of their mandatory training day. The training was delivered face to face in January 2020 but, due to the COVID-19 pandemic, is now being undertaken as e-learning for the remainder of the year. The eLearning utilised is hosted on the Trust's learning platform HEY247, and is entitled 'Modern Slavery and Human Trafficking'.

The Safeguarding Teams provide additional ad-hoc training and day to day support around modern slavery when requested.

#### 4. Summary

Since the requirement for organisations to produce an annual Modern Slavery Statement, the Trust has continued to demonstrate an ongoing commitment to preventing slavery and human trafficking in any part of our business or supply chains.

The Trust is committed to:

- Continuing to educate staff on the importance of preventing modern slavery and to meet the obligations under the national modern slavery agenda.
- Monitor and review ongoing modern slavery legislation and best practice.
- Obtain assurances from main suppliers/agencies etc. that they comply with the Modern Slavery Act 2015 and ensure these are recorded and monitored within the relevant department
- Review Trust corporate policies and include references to modern slavery where appropriate.
- Consider whether an Awareness Raising Programme can be held remotely.

The Trust Board has considered and approved this statement and will continue to support the requirements of the legislation.

Signed



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Mr Terry Moran  
Chairman

Dated 10 November 2020

Signed



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Mr Chris Long  
Chief Executive

Dated 10 November 2020